

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

In re:	)	
	)	
AUBREY JAY MILLER, and	)	Case No. 15-11394
SHIRELY ANN MILLER,	)	(Chapter 7)
	)	
Joint Debtors.	)	
	)	
ALLY FINANCIAL, INC.,	)	
	)	
Plaintiff,	)	
	)	Adv. Proc. No. 15-01236 SAH
v.	)	
	)	
AUBREY JAY MILLER, and	)	
SHIRLEY ANN MILLER, et al.	)	
	)	
Defendants.	)	

**MOTION TO WITHDRAW AS DEFENDANTS' COUNSEL, WITH BRIEF COMBINED,  
AND NOTICE OF OPPORTUNITY FOR HEARING**

**Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effect of this document.** If you do not want the court to grant the requested relief, or you wish to have your rights considered, you must file a written response or objection to the requested relief with the Clerk of the United States Bankruptcy Court for the Western District of Oklahoma, 215 Dean A McGee Avenue, Oklahoma City, OK 73102 no later than 14 days from the date of filing of this request for relief. You should also serve a file-stamped copy of your response or objection to the undersigned movant/movant's attorney [and others who are required to be served] and file a certificate of service with the court. If no response or objection is timely filed, the Court may grant the requested relief without a hearing or further notice.

**The 14 day period includes the three (3) days allowed for mailing provided for in Bankruptcy Rule 9006(t).**

COMES NOW counsel for defendants Aubrey Jay Miller and Shirley Ann Miller (collectively, "Miller,") B DAVID SISSON ("Sisson,") pursuant to Local Rule 9010-1(C),

and respectfully moves this Honorable Court ("Motion") for leave to withdraw. In support, counsel shows the Court:

- 1 Miller employed Sisson for representation in the instant adversary proceeding.
- 2 Miller has not complied with the terms of continuing representation.
- 3 Continuing representation of Miller in this matter imposes an unreasonable financial burden on Sisson.

WHEREFORE, counsel prays for leave to withdraw from the instant adversary proceeding, and for all other relief to which he is justly entitled.

Respectfully submitted,

/s/ B David Sisson

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ATTORNEY FOR DEFENDANTS,  
AUBREY JAY MILLER  
SHIRLEY ANN MILLER

#### CERTIFICATE OF SERVICE

I hereby certify that on the 15<sup>th</sup> Day of March, 2016, a true and correct copy of the above document was electronically served using the CM/ECF system, namely:

U.S. Trustee | Ustpregion20.oc.ecf@usdoj.gov  
Brian J. Rayment Esq. | brayment@kivell.com  
Jerry D. Brown Esq. | jdbrownpc@sbcglobal.net

/s/ B David Sisson